



Danielle Hamilton <hamilton@loevy.com>

Jaimes v. Cook County

Danielle Hamilton <hamilton@loevy.com>

Thu, Feb 28, 2019 at 5:02 PM

To: Elizabeth Ekl <eekl@reiterburns.com>

Cc: Katie Roche <katie@loevy.com>, Mike Kanovitz <mike@loevy.com>

Beth, thanks for the update. We are still missing the following:

- Erika Aguirre Cook County Sheriff's Police Department tests and results (RFP No. 11) - requested November 2018
- Cook County insurance policy effective Nov 2015 (RFP No. 9) - requested November 2018, you've given us the policy numbers but not the policies themselves
- Employee vs. employee OPR complaints (RFP No. 18) - ordered produced by the Court on October 29, 2018

These documents were ordered to be produced or requested four months ago. And we proposed dates for the depositions 2 weeks ago. Given the tight deadlines in this case, we cannot waste any more time. Please confirm in writing by COB tomorrow that these documents will be produced no later than March 4 so that we may review them in time for the depositions beginning the week of March 11. Please also confirm in writing by COB tomorrow that dates and deponents for depositions during the week of March 11 will be set no later than March 4 so that we can adequately prepare.

If we do not hear from you, we will file a motion with the Court on the outstanding discovery, issue notices for the depositions, and proceed from there.

Thanks for your attention to these matters,
Danielle

--

Danielle Hamilton
Loevy & Loevy
311 N. Aberdeen Street, 3rd Floor
Chicago, Illinois 60607
(312) 243-5900

On Thu, Feb 28, 2019 at 11:39 AM Elizabeth Ekl <eekl@reiterburns.com> wrote:

Counsel,

I was not able to confirm availability of a 30(b)(6) witness for tomorrow. However, I am working on getting dates for the all of the depositions that you propose. I am also trying to determine if one of the CCSO witnesses whom you seek to depose individually can also cover the remaining 30(b)(6) deposition you seek regarding incidents of correctional officers being approached off-duty by former detainees. This will avoid the necessity of an additional deponent on a fairly narrow topic.

Defendants' response to plaintiffs' 3rd set of requests for production are due next week. We anticipate timely responding to that request, which seeks certain *ad hoc* IAPRO reports.

I am tied up today until late afternoon/early evening. I will be around tomorrow, if there is anything else you would like to discuss further.

-Beth



Elizabeth A. Ekl

Partner

Reiter Burns LLP
311 S Wacker Drive, Suite 5200

Chicago IL 60606

P 312 878 1297

E eekl@reiterburns.com **W** reiterburns.com

This email is sent by a law firm and may contain information that is privileged or confidential.
If you are not the intended recipient, please delete the email and any attachments, and notify us immediately.